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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

MAIJOU MILLER,  
Plaintiff,  
v.  
FRANK BISIGNANO,  
COMMISSIONER OF SOCIAL  
SECURITY,  
Defendant.

} Case No. 1:25-cv-00615-JLT-BAM

} STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 22, 2025 to October 21, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of August 18, 2025 and August 25, 2025,  
2 Plaintiff's Counsel has eleven merit briefs due. Counsel requires additional time to  
3 brief the issues thoroughly for the Court's consideration. Defendant does not  
4 oppose the requested extension. Counsel apologizes to the Defendant and Court  
5 for any inconvenience this may cause.

6  
7 Respectfully submitted,

8 Dated: July 30, 2025 PENA & BROMBERG, ATTORNEYS AT LAW  
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10 By: /s/ Jonathan Omar Pena  
11 JONATHAN OMAR PENA  
12 Attorneys for Plaintiff

13  
14 Dated: July 30, 2025 KIMBERLY A. SANCHEZ  
15 United States Attorney  
16 MATHEW W. PILE  
17 Associate General Counsel  
18 Office of Program Litigation  
Social Security Administration

19  
20 By: \*/s/ Katherine Sarah Bowles  
21 Katherine Sarah Bowles  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
(\*As authorized by email on July 30, 2025)

## ORDER

Pursuant to the parties' stipulation and good cause appearing, Plaintiff shall have a 60-day extension of time, from August 22, 2025 to October 21, 2025, for Plaintiff to serve Defendant with Plaintiff's motion for summary judgement. All other dates in the Court's Scheduling Order shall be extended accordingly.

IT IS SO ORDERED.

Dated: August 1, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE